

**CWA COMPLIANCE EVALUATION INSPECTION REPORT**  
**U.S. ENVIRONMENTAL PROTECTION AGENCY, REGION 5**

**Purpose:** Compliance Evaluation Inspection

**Facility:** E&R Livestock  
Ex. 6 (Personal Privacy)  
[REDACTED]

**NPDES Permit Number:** None

**Date of Inspection:** 9/18/2013

**EPA Representatives:** Ben Atkinson, Enforcement Officer  
Atkinson.ben@epa.gov, 312-353-8243

Joan Rogers, Environmental Scientist  
312-886-2785

**State Representatives:** Jeff Holste

**Facility Representatives:** Ex. 6 (Personal Privacy) Owner, Ex. 6 (Personal Privacy)  
Ex. 6 (Personal Privacy) Co-Owner

**Report Prepared by:** Ben Atkinson, Enforcement Officer

**Report Date:** 7/1/2014

**Inspector Signature** 

## 1. BACKGROUND

The purpose of this report is to describe, evaluate and document E&R Livestock's compliance with the Clean Water Act (CWA) at its Penfield, Illinois facility on September, 18 2013. This inspection was performed pursuant to Section 308(a) of the Federal Water Pollution Control Act, as amended.

E&R Livestock is a partnership heifer/calf operation in Champaign County, Illinois. It is owned and operated by Mr. **Ex. 6 (Personal Privacy)** (father) and Mr. **Ex. 6 (Personal Privacy)**. The facility is located at **Ex. 6 (Personal Privacy)**. At the time of inspection, September 18, 2013, the facility had approximately 1,000 heifers. 850 heifers were housed in total confinement; all other cattle were under partial confinement and had access to open lots. Mr. **Ex. 6 (Personal Privacy)** stated that the facility had a capacity of 1,400 animals. A facility map identifying each barn and waste handling structure is located in Appendix A. E&R Livestock is considered a Large Concentrated Animal Feeding Operation (CAFO) due to the number of heifers maintained on the facility. There is currently no National Pollutant Discharge Elimination System (NPDES) permit allowing discharge from the site and the facility has never applied for one.

Surface runoff from the east side of the facility would flow .28 miles to perennial Buck Creek. From the west side, runoff flows .11 miles to an intermittent unnamed tributary then .5 miles to perennial Buck Creek. Buck Creek then flows approximately 5 miles to Middle Fork Vermillion River. Middle Fork Vermilion River then flows approximately 31 miles to the overpass of Interstate 74 where it becomes a Traditional Navigable Waterway.

## 2. SITE INSPECTION

I arrived at the E&R Livestock site at approximately 9:30 a.m. on September 18, 2013. I parked the vehicle near the machine shed. Mr. Jeff Holste of Illinois Environmental Protection Agency (IEPA) arrived at the same time in his vehicle. The temperature was approximately 68° F and it was partly cloudy. A weather station approximately 10 miles away in Rantoul, Illinois recorded 0.02 inches of rain at 3:15 A.M. Upon arrival, Ms. Joan Rogers and I put on disposable boots. I introduced myself and Ms. Rogers and we presented our credentials to Mr. **Ex. 6 (Personal Privacy)**. I asked Mr. **Ex. 6 (Personal Privacy)** if he was able to act as the official facility representative for E&R Livestock. He said that he was a co-owner and would represent the facility and that his **Ex. 6 (Personal Privacy)** Mr. **Ex. 6 (Personal Privacy)** was currently busy.

I explained to Mr. **Ex. 6 (Personal Privacy)** that I would be conducting a Concentrated Animal Feeding Operation (CAFO) inspection to evaluate E&R Livestock for compliance with the requirements of the CWA and to determine whether or not they require a permit. I also let him know that the inspection would serve as a state oversight inspection.



I explained that the inspection would consist of a review of facility operations, required records, waste generation and management practices, and a visual inspection of the site. I stated that I would document my findings and observations by taking photographs, obtaining statements from facility staff, and by collecting samples if necessary. Mr. [REDACTED] Ex. 6 (Personal Privacy) stated that his father handled the record keeping and paper work, but that he knew where the NMP was and would make it available.

## **2.1 Interview, Nutrient Management Plan (NMP) and Records Review**

Mr. [REDACTED] Ex. 6 (Personal Privacy) stated that the facility employs only family members including his father and his two brothers. He said that E&R Livestock is owned by his father, grandfather, and brothers. Mr. [REDACTED] Ex. 6 (Personal Privacy) stated that the average number of animals maintained at the facility was usually near 1,000 fluctuating by 200 animals with a maximum capacity of 1,400 animals. He stated that they have capacity for approximately 1,200 animals in total confinement and another 200 on pasture. Upon inspection the pastures referred to were denuded feed lots. Mr. [REDACTED] Ex. 6 (Personal Privacy) stated that the animals do not have access to waters of the United States.

### **Livestock Waste Management**

Mr. [REDACTED] Ex. 6 (Personal Privacy) stated that they were currently using two manure pits, a concrete stacking pad, and a manure transfer pit. A leachate transfer pit that was under construction at the time of the inspection. The two manure pits had a combined volume of approximately 1.2 million gallons. The older pit, pit 1, was designed by the facility. The newer pit was designed with the help of the Department of Agriculture. Both manure pits are clay lined. The concrete pad could hold 1000 tons of solid manure. Mr. [REDACTED] Ex. 6 (Personal Privacy) stated that the manure from the total confinement pens 7 and 4 is scraped daily and gravity flows to manure pit 1. Solid manure and bedding from pens 1,2,3,5, and 6 are scraped on a weekly basis and stacked in the manure bays east of pen 6. Liquid manure from these pens is scraped and gravity flows to the manure transfer pit located south of manure pit 1. Manure from the transfer pit is pumped to manure pit 1. Manure from the open lots is scrapped and either hauled for spreading or stored in the manure bays. Runoff from the open lots sheet flows to the adjacent fields without any visible erosional features or manmade conveyances.

The cattle are provided drinking water tip tank waterers. The source of the drinking water is from a well. Waste drinking water is contained with manure and used bedding. The facility uses saw dust as bedding and the used bedding is handled with the manure.

Mr. [REDACTED] Ex. 6 (Personal Privacy) stated that the pits were last pumped in spring of 2013. He stated they had over 800 acres available for land application. He said records of land application were kept with the nutrient management plan.

**Table 2: Livestock Waste Storage**

Type of Storage	Storage Capacity	Type of Liner	Depth Markers Present	Last Time Waste was Removed	Days of Storage
2 Manure Pits	1.2 million Gallons	Clay	No	Spring 2013	180
Concrete stacking pad	1000 tons	Concrete	NA	Spring 2013	3-4 months
Leachate Pit (under construction)	Unknown	Concrete	No	NA	NA
Records at site of storage structure design?			No		
Additional Information:					

### **Receiving Surface Waters**

Surface runoff from the east side of the facility would flow .28 miles to perennial Buck Creek. From the west side, runoff flows .11 miles to an intermittent unnamed tributary then .5 miles to perennial Buck Creek. Buck Creek then flows approximately 5 miles to Middle Fork Vermillion River. Middle Fork Vermillion River then flows approximately 31 miles to Interstate 74 where it becomes a Traditional Navigable Waterway.

### **2.2 Walkthrough of the Facility**

To facilitate the walkthrough section of this report, overview photographs are included in Attachment 1 which includes building labels, outlines of drainage pathways, and waterway locations. The inspection photographs are in Attachment 2.

EPA began its inspection on the south east corner of the facility. I walked past the grain silos where feed is stored (Attachment 2: IMGP0276). I then continued to walk west along Pen 1. No animals were present in Pen 1 at the time of inspection. I noted the exterior portion of Pen 1 was denuded. The runoff from Pen 1 would flow to a vegetated field to the south. No runoff was noted at the time of the inspection (Attachment 2: IMGP0277, IMGP0278, IMGP0279, IMGP0280). I walked to the end of Pen one and turned north walking along the west end of Pen 1. Scrap metal was seen being stored at the west of Pen 1. (Attachment 2: IMGP0281, IMGP0282). I continued to walk north along the west end of Pen 10. Animals were present in Pen 10. Within the fenced in exterior portion of Pen 10, a berm was noted. Mr. Ex. 6 (Personal Privacy) stated that this berm was intentionally placed there for the animals to have a place to lay. I continued to walk north past pen 5) (Attachment 2: IMGP0283, IMGP0284, IMGP0285, IMGP02806. I walked north past a dry storage shed and the feed storage area. Straw and Hay were



stacked within the shed and outside next to a mound of silage (Attachment 2: IMGP0287, IMGP0288, IMGP0289, IMGP0290). Runoff from the silage and feed storage areas appeared to flow north to a soybean field. There appeared to be some nutrient burn in the field (Attachment 2: IMGP0291, IMGP0292, IMGP0293). I walked east past the mortality management area where mortalities are buried. No improper burial was noted (Attachment 2: IMGP0294, IMGP0295, IMGP0296). I walked further east and noted more nutrient burning and a path way from the silage storage area to the soybean field (Attachment 2: IMGP0297, IMGP0298, IMGP0299). The pathway and nutrient burning disappeared in the field (Attachment 2: IMGP0300, IMGP0301, IMGP0302). I continued east along the north side of barn 7 (Attachment 2: IMGP0303, IMGP0304, IMGP0305). There was some manure noted outside of the fenced area on the east side of the northern barn, but no runoff was seen (Attachment 2: IMGP0306, IMGP0307). I walked east along pond 1. I noted the area where manure is pushed into pond 1. The manure level in pond 1 was high, but controlled by an overflow structure into pond 2 (Attachment 2: IMGP0308, IMGP0309, IMGP0310). I walked around pond 2. Pond 2 is narrow than pond 1. Pond 2 appeared to have approximately 4' of freeboard. No depth gages were present (Attachment 2: IMGP0311, IMGP0312, IMGP0313, IMGP0314, IMGP0315, IMGP0316, IMGP0317, IMGP0318).

I walked east and noted a pile of agricultural lime and corn gluten meal stored at the north east end of the facility (Attachment 2: IMGP0319). A berm had been built on the east side of the corn gluten meal in an attempt to prevent runoff from entering the road side ditch (Attachment 2: IMGP0320, IMGP0321, IMGP0322, IMGP0323). The berm was not successful at stopping the leachate. A dark discolored pathway was observed from a puddle of leachate on the far side of the berm which appeared to flow under/through the berm and into the ditch. The vegetation in the ditch appeared to be nutrient burned and discolored (Attachment 2: IMGP0324, IMGP0325, IMGP0326, IMGP0327, IMGP0328). It appeared that some solids from the corn gluten meal had previously entered the roadside ditch. This ditch flowed under the driveway to the facility (Attachment 2: IMGP0329, IMGP0330, IMGP0331). It also appeared that runoff and leachate may be flowing over the driveway and to the roadside ditch (Attachment 2: IMGP0332, IMGP0333). At the time of the inspection a concrete reception pit was under construction. This pit will collect the stormwater and leachate from around the corn gluten meal and pump it to the manure storage ponds (Attachment 2: IMGP0334, IMGP0335, IMGP0336, IMGP0337).

I walked west along the northern driveway. The storm water from the roofs of pens 4 and 7 is directed to a pipe which outlets in the grassed area between the facility's driveways (Attachment 2: IMGP0338, IMGP0339, IMGP0340). I continued to walk west. I noted the manure transfer pit which receives manure from pen 3. A berm along the access road south of pen 4 directs process wastewater to the transfer pit. The transfer pit outlets to pond 1 (Attachment 2: IMGP0341, IMGP0342, IMGP0343, IMGP0344, IMGP0345).

I walked west and inspected the grassed area between pen 4 and pen 7. I noted the inlet pipe which receives the roof water (Attachment 2: IMGP0346, IMGP0347). An additional pile of corn gluten meal is located west of pen 4. The ground around the pile

was sloped to the east. Runoff from this area could flow to the inlet pipe between pens 4 and 7 which could result in a discharge through the pipe and eventually to the roadside ditch. No flow path was observed on the day of the inspection (Attachment 2: IMGP0348, IMGP0349).

I walked west and observed the commodity shed. A pile of sawdust to be used as bedding was noted next to pen 5 (Attachment 2: IMGP0350, IMGP0351, IMGP0352). I walked back south past pen 6. Manure and process wastewater from this pen flows east to the concrete manure transfer pit. I continued walking east past the storage bunkers. Manure and sawdust were stored in the bunkers. Process wastewater from the bunkers flows east to the concrete manure transfer pit (Attachment 2: IMGP0353, IMGP0354, IMGP0355, IMGP0356, IMGP0357).

I then concluded the walkthrough by returning to the starting point on the southeast corner of the facility.

### **2.3 Closing Conference and Post-Inspection**

At the conclusion of the walkthrough, I summarized my findings and observations to Mr. **Ex. 6 (Personal Privacy)**. I expressed the following areas of concern:

1. The corn gluten meal on the east side of the facility seemed to be discharging leachate despite the berm.
2. The corn gluten meal on the west side of the facility could potentially discharge leachate to the inlet pipe between pens 4 and 7.

I explained E&R Livestock's right to make a claim of business confidentiality and presented **Ex. 6 (Personal Privacy)** with a Confidentiality Notice. Mr. **Ex. 6 (Personal Privacy)** did not make any confidentiality claims at the time of the inspection.

### **2.4 Sampling Information**

No sampling was done at the facility.



### **3. POTENTIAL VIOLATIONS AND AREAS OF CONCERN**

According to Section 301(a) of the Clean Water Act, it is a violation to discharge pollutants from a CAFO to waters of the United States without a permit.

EPA observed potential violations and areas of concern in the following locations:

1. The corn gluten meal stored on the east side of the facility appears to have been discharging leachate and potentially solids to the roadside ditch both by leachate moving through the constructed berm and by overland flow across the driveway.
2. The corn gluten meal stored on the west side of the facility could potentially discharge leachate and solids to the inlet pipe between pens 4 and 7.

## **LIST OF ATTACHMENTS**

1. Aerial photographs of E&R Livestock
2. Inspection Photographs



## ATTACHMENT 1: AERIAL PHOTOGRAPHS OF E&R LIVESTOCK

Figure 1.1: Aerial Photograph of E&R Livestock  
E&R Livestock

Ex. 6 (Personal Privacy)



1 inch = 200 feet



Figure 1.2: Aerial Photograph of National Hydrography Dataset (NHD) Waterways from the United States Geological Survey (USGS)

E&R Livestock

Ex. 6 (Personal Privacy)

### Legend

#### National Hydrography Dataset Waterways

- Other waterways
- Buck Creek
- Middle Fork Vermilion River

Facility

1 inch = 4,000 feet

Middle Fork Vermilion River

Buck Creek





## ATTACHMENT 2: INSPECTION PHOTOGRAPHS



E & R Livestock Inspection Photo Log

September 18, 2013

All photos taken by Joan Rogers, EPA, Environmental Scientist/Enforcement Officer  
(Actual time is one hour later than the time stamp on photo.)

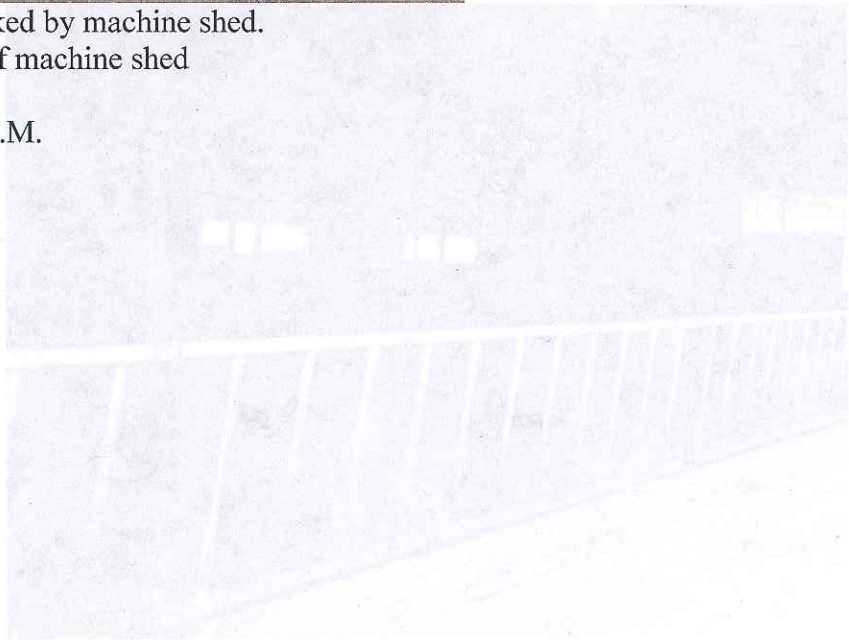


IMGP0275: EPA vehicle parked by machine shed.

Location: Northwest corner of machine shed

Facing: East

Date/Time: 09/18/13 10:05 A.M.



IMGP0275: Pen 1 is empty on the day of the inspection.  
Location: South of Pen 1 barn  
Facing: Northwest  
Date/Time: 09/18/13 10:08 A.M.





IMGP0276: Grain silos.  
 Location: West of machine shed.  
 Facing: West  
 Date/Time: 09/18/13 10:07 A.M.



IMGP0277: Pen 1 is empty on the day of the inspection.  
 Location: South of Pen 1 barn.  
 Facing: Northwest  
 Date/Time: 09/18/13 10:08 A.M.





IMGP0278: Pen 1 fencing.  
 Location: South of Pen 1.  
 Facing: North  
 Date/Time: 09/18/13 10:09 A.M.



IMGP0279: Runoff from Pen 1 would flow to a vegetated field to the south.  
 Location: South of Pen 1.  
 Facing: Northwest  
 Date/Time: 09/18/13 10:09 A.M.





IMGP0280: Southwest corner of Pen 1. Flow off the pen would go to the west.

Location: Southwest corner of Pen 1.

Facing: Northeast

Date/Time: 09/18/13 10:12 A.M.



IMGP0281: Flow off of Pen 1 would flow to the west. No evidence of manure runoff into the soybean field.

Location: Southwest corner of Pen 1.

Facing: West

Date/Time: 09/18/13 10:13 A.M.





IMGP0282: Scrap metal stored along the west fence of Pen 1. No evidence of manure and process wastewater pathways from Pen 1 to waters of the U.S. on the day of the inspection.

Location: West of Pen 1.

Facing: Southeast

Date/Time: 09/18/13 10:14 A.M.



IMGP0283: Cattle in Pen 10.

Location: West of Pen 1.

Facing: Northeast

Date/Time: 09/18/13 10:15 A.M.





IMGP0284: Clay berm in Pen 10 for cattle to use.

Location: West of Pen 10.

Facing: Northeast

Date/Time: 09/18/13 10:16 A.M.



IMGP0285: Cattle in Pen 10. No evidence of runoff of manure and process wastewater from Pen 10 on the day of the inspection.

Location: Northwest corner of Pen 10.

Facing: Southeast

Date/Time: 09/18/13 10:17 A.M.





IMGP0286: Pen 5  
 Location: Northwest corner of Pen 10.  
 Facing: Southeast  
 Date/Time: 09/18/13 10:18 A.M.



IMGP0287: Hay in Commodity barn.  
 Location: North of Pen 10.  
 Facing: East  
 Date/Time: 09/18/13 10:18 A.M.





IMGP0288: Silage stacked on silage pad. Silage is not covered or in bunkers

Location: Northwest corner of production area.

Facing: Southeast

Date/Time: 09/18/13 10:19 A.M.



IMGP0289: Silage stacked on silage pad. Silage is not covered or in bunkers.

Location: Northwest corner of production area.

Facing: Southeast

Date/Time: 09/18/13 10:19 A.M.





IMGP0290: Hay bales stacked next to silage pile.

Location: Northwest corner of facility.

Facing: Southeast

Date/Time: 09/18/13 10:19 A.M.



IMGP0291: Soybean field north of silage pile appears to be nutrient burned.

Location: North of silage pile.

Facing: Northeast

Date/Time: 09/18/13 10:21 A.M.





IMGP0292: Silage and straw bales.  
 Location: Northwest corner of production area.  
 Facing: South  
 Date/Time: 09/18/13 10:22 A.M.



IMGP0293: Soybean field north of silage pile appears to be nutrient burned.  
 Location: North of silage pile.  
 Facing: Northeast  
 Date/Time: 09/18/13 10:22 A.M.





IMGP0294: Mortality burial location. Mortalities are buried at least 4' deep.

Location: West of silage pile.

Facing: West

Date/Time: 09/18/13 10:24 A.M.



IMGP0295 Ex. 6 (Personal Privacy) stated that they only have about eight mortalities per year.

Location: West of silage pile.

Facing: West

Date/Time: 09/18/13 10:25 A.M.





IMGP0296: EPA did not observe any improper mortality management on the day of the inspection.

Location: West of silage pile.

Facing: Southwest

Date/Time: 09/18/13 10:25 A.M.



IMGP0297: Leachate from the silage pile flows to the north to a crop field. Corn shucks are also stacked in a pile in this area.

Location: North of silage pile

Facing: Southwest

Date/Time: 09/18/13 10:28 A.M.





IMGP0298: Leachate pathway from silage pile to the crop field.

Location: North of silage pile.

Facing: South

Date/Time: 09/18/13 10:29 A.M.



IMGP0299: EPA followed leachate pathway into the crop field as far as evidence of the leachate was visible.

Location: North of silage pile.

Facing: South

Date/Time: 09/18/13 10:29 A.M.





IMGP0300: Leachate pathway eventually was not visible in the crop field.

Location: North of silage pile.

Facing: Southwest

Date/Time: 09/18/13 10:30 A.M.



IMGP0301: Leachate pathway from silage pile.

Location: North of silage and corn shuck pile.

Facing: West

Date/Time: 09/18/13 10:32 A.M.





IMGP0302: Corn stalks piled near the corn shucks.

Location: North side of silage pad

Facing: East

Date/Time: 09/18/13 10:34 A.M.



IMGP0303: North side of Pen 7.

Location: North of North Barn

Facing: Southwest

Date/Time: 09/18/13 10:35 A.M.





IMGP0304: North side of Pen 7.  
 Location: North of North Barn  
 Facing: South  
 Date/Time: 09/18/13 10:35 A.M.



IMGP0305: North side of Pen 7.  
 Location: North of North Barn  
 Facing: Southeast  
 Date/Time: 09/18/13 10:35 A.M.





IMGP0306: Open pen attached to the east side of Pen7. Manure from this barn is manually scraped directly to Pond #1, just to the east of the open pen.

Location: North side of Pen 7.

Facing: South

Date/Time: 09/18/13 10:37 A.M.



IMGP0307: Although there was some manure outside the pen, EPA did not observe any runoff pathways from the open pen to a water of the U.S.

Location: North of Pen 7.

Facing: South

Date/Time: 09/18/13 10:37 A.M.





IMGP0308: Manure is pushed into Pond #1. Manure level in Pond #1 was high.

Location: North of Pond #1

Facing: South

Date/Time: 09/18/13 10:37 A.M.



IMGP0309: Pond #1 is very full.

Location: North of Pond #1

Facing: Southeast

Date/Time: 09/18/13 10:38 A.M.



IMGP0310: Once Pond #1 reaches a certain level, the overflow goes to Pond #2 via a weir.

Location: North of Pond #1

Facing: Southeast

Date/Time: 09/18/13 10:38 A.M.



IMGP0311: Pond #2 is narrower than Pond #1. It receives the overflow from Pond #1 via a weir.

Location: Northeast corner of Pond #1

Facing: Northeast

Date/Time: 09/18/13 10:38 A.M.





IMGP0312: Pond #2 appears to have approximately 4' of freeboard.

Location: Northeast corner of Pond #1

Facing: East

Date/Time: 09/18/13 10:38 A.M.



IMGP0313: Neither pond has a staff guage.

Location: Northeast corner of Pond #1

Facing: Southeast

Date/Time: 09/18/13 10:39 A.M.





IMGP0314: Vegetation on berms of ponds is kept mowed.

Location: On the berm between Pond #1 and Pond #2

Facing: South

Date/Time: 09/18/13 10:39 A.M.



IMGP0315: Weir between Pond #1 and Pond #2. Pond #1 is on the right.

Location: On the berm between Pond #1 and Pond #2

Facing: Down

Date/Time: 09/18/13 10:40 A.M.





IMGP0316: Weir between Pond #1 and Pond #2. Pond #2 is on the left.

Location: On the berm between Pond #1 and Pond #2

Facing: Down

Date/Time: 09/18/13 10:40 A.M.





IMGP0317: Weir between Pond #1 and Pond #2. Pond #2 is in the background. Vegetation is growing in the solids that have accumulated in the bottom of the weir.

Location: On the berm between Pond #1 and Pond #2

Facing: East

Date/Time: 09/18/13 10:40 A.M.



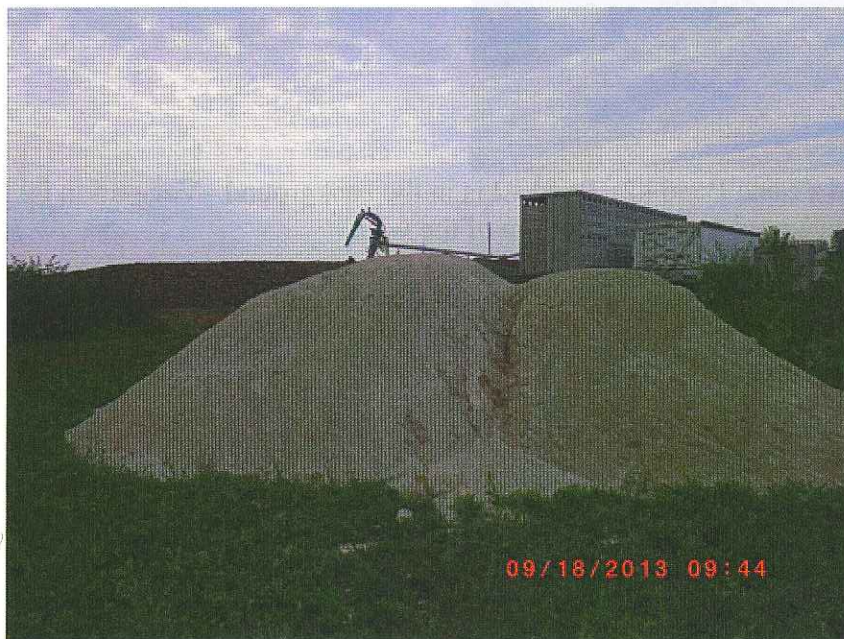


IMGP0318: Arrow indicates location of a 60'x60' concrete pad in the pond that is the location of where the trucks will back in to remove manure from the pond.

Location: On the berm between Pond #1 and Pond #2

Facing: Northeast

Date/Time: 09/18/13 10:41 A.M.



IMGP0319: Pile of Agricultural Lime is in the foreground. Corn gluten meal pile is in the background.

Location: East of Pond #2

Facing: Southeast

Date/Time: 09/18/13 10:44 A.M.





IMGP0320: The area to the east of the ponds is on a topographic high. Arrow indicates location of the beginning of the roadside ditch that flows to the south (to the right in this photo) along County Road 2600 E.

Location: North of corn gluten meal pile

Facing: East

Date/Time: 09/18/13 10:45 A.M.



IMGP0321: Corn gluten meal pile is not covered.

Location: North of corn gluten meal pile

Facing: South

Date/Time: 09/18/13 10:46 A.M.





IMGP0322: Corn gluten meal pile.  
 Location: Northeast of corn gluten meal pile  
 Facing: Southwest  
 Date/Time: 09/18/13 10:46 A.M.



IMGP0323: Leachate from corn gluten meal pile flows to off the pile.  
 Location: Northeast of corn gluten meal pile  
 Facing: West  
 Date/Time: 09/18/13 10:46 A.M.





IMGP0324: Leachate from corn gluten meal is in roadside ditch. Ditch had recently been scraped, but evidence of the leachate was still in the ditch.  
 Location: Roadside ditch east of corn gluten meal pile  
 Facing: Down  
 Date/Time: 09/18/13 10:47 A.M.



IMGP0325: Lime berm has been created to prevent leachate from corn gluten meal from reaching the roadside ditch, but the leachate appears to be flowing through and under the berm and reaching the ditch.  
 Location: Roadside ditch east of corn gluten meal pile  
 Facing: West  
 Date/Time: 09/18/13 10:48 A.M.





IMGP0326: Berm to prevent corn gluten meal leachate from reaching the roadside ditch has been compromised and leachate continues to flow to the ditch.

Location: Roadside ditch east of corn gluten meal pile

Facing: West

Date/Time: 09/18/13 10:48 A.M.



IMGP0327: A culvert allows flow from the roadside ditch, and process wastewater from the corn gluten meal pile, to flow under the facility driveway. EPA observed evidence of the process wastewater from the corn gluten meal in the roadside ditch at the entrance to the culvert.

Location: Southeast of corn gluten meal pile

Facing: South and down

Date/Time: 09/18/13 10:49 A.M.





IMGP0328: Vegetation in the roadside ditch appears to be nutrient burned.

Location: Southeast of corn gluten meal pile

Facing: North

Date/Time: 09/18/13 10:49 A.M.





IMGP0329: The outlet for the culvert under the driveway allows the flow in the roadside ditch to continue to the south. EPA observed evidence of process wastewater from the corn gluten meal pile in the roadside ditch south of the culvert pipe outlet.

Location: Facility driveway south of corn gluten meal pile

Facing: South and down

Date/Time: 09/18/13 10:50 A.M.





IMGP0330: EPA displaces some of the material in the bed of the roadside ditch to see how deep the discoloration from the corn gluten meal leachate went. EPA estimated that the discoloration was approximately two to three inches deep.

Location: Roadside ditch south of the facility driveway

Facing: Down

Date/Time: 09/18/13 10:50 A.M.





IMGP0331: Culvert pipe outlet south of the facility driveway. Note the dark discoloration from the corn gluten meal leachate.

Location: Roadside ditch south of facility driveway

Facing: North and down

Date/Time: 09/18/13 10:51 A.M.





IMGP0332: Staining on the ground from the corn gluten meal leachate indicates that pathways that the process wastewater from the corn gluten meal takes.

Location: South of corn gluten meal pile

Facing: North

Date/Time: 09/18/13 10:51 A.M.



IMGP0333: Staining of the facility driveway shows the southward path of the leachate and process wastewater from the corn gluten meal pile.

Location: South of corn gluten meal pile

Facing: West

Date/Time: 09/18/13 10:51 A.M.





IMGP0334: Concrete pit installed in the ground will accept the stormwater and process wastewater from the corn gluten meal pad. Mr. Rademacher is waiting on the pump to be delivered.

Location: Southwest corner of corn gluten meal pile

Facing: North and down

Date/Time: 09/18/13 10:52 A.M.



IMGP0335: Concrete pit installed in the ground will accept the stormwater and process wastewater from the corn gluten meal pad.

Location: Southwest corner of corn gluten meal pile

Facing: North and down

Date/Time: 09/18/13 10:52 A.M.





IMGP0336: A concrete berm will eventually be installed to divert all water to the concrete pit.  
The pump will pump all water to Pond #2.  
Location: Facility driveway southwest of corn gluten meal pile  
Facing: Northeast  
Date/Time: 09/18/13 10:53 A.M.



IMGP0337: Runoff pathways from corn gluten meal pile flow to the south to a vegetated yard.  
Vegetation appears nutrient burned in the yard.  
Location: Facility driveway southwest of corn gluten meal pile  
Facing: Southeast  
Date/Time: 09/18/13 10:53 A.M.





IMGP0338: Facility driveway looking west. Roof water from pens 4 and 7, to the right in the photo, flows into the yard between the barns and to a pipe inlet. The pipe outlets the storm water to the yard south of the driveway.

Location: Facility driveway south of corn gluten meal pile

Facing: West

Date/Time: 09/18/13 10:58 A.M.



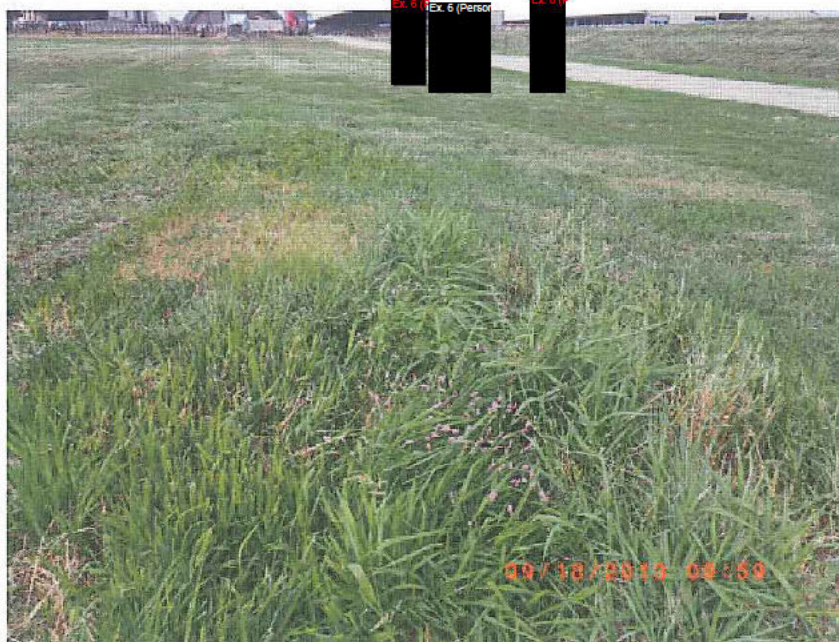
IMGP0339: Outlet pipe for storm water from roof water for the North and South Barns.

Location: In the yard south of the facility driveway.

Facing: Down

Date/Time: 09/18/13 10:59 A.M.





IMGP0340: Location of outlet for storm water pipe that originates in the yard between the pens 4 and 7.

Location: South of facility driveway

Facing: Northwest

Date/Time: 09/18/13 10:59 A.M.



IMGP0341: Manure pit that receives manure and process wastewater from Pen 3. Manure and process wastewater is then pumped to Pond #1.

Location: East of Pen 3.

Facing: Southeast and down

Date/Time: 09/18/13 11:00 A.M.



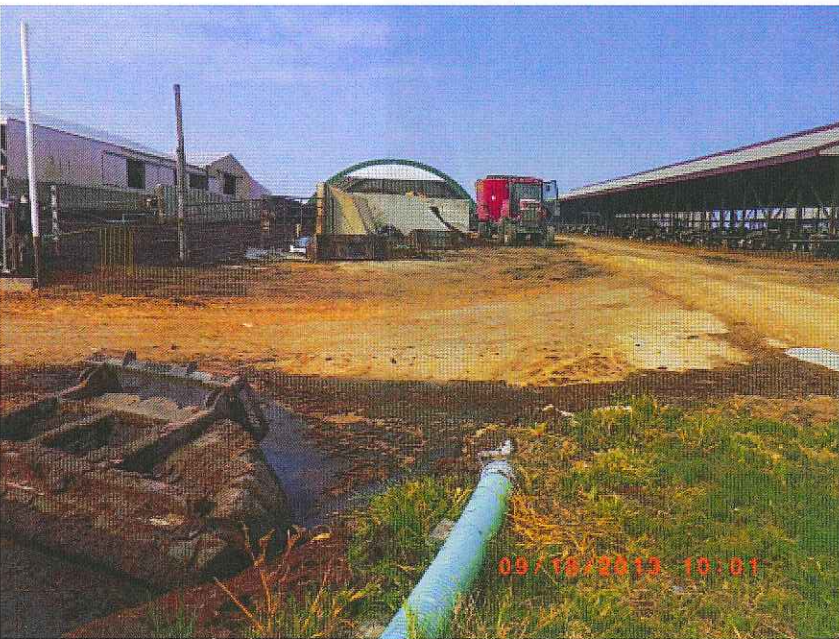


IMGP0342: Manure is scraped and also flows via gravity to the pit. Dirt curbing directs the flow of process wastewater from Pen 3 to the pit.

Location: East of Pen .

Facing: Southwest

Date/Time: 09/18/13 11:00 A.M.



IMGP0343: Process wastewater flows via gravity to the manure pit for Pen 3. Note the berm to direct the flow of water alongside the driveway.

Location: East of Pen 3.

Facing: West

Date/Time: 09/18/13 11:01 A.M.





IMGP0344: Pipe in pit pumps manure to Pond #1.

Location: East of Pen 3.

Facing: Down

Date/Time: 09/18/13 11:02 A.M.



IMGP0345: Lucy walks near the outlet of pipe from manure pit to Pond #1.

Location: Southwest side of Pond #1

Facing: Northeast and down.

Date/Time: 09/18/13 11:02 A.M.





IMGP0346: The inlet pipe in the yard between pens 4 and 7 receives all roof water from the two barns.

Location: East end of the yard between pens 4 and 7.

Date/Time: 09/18/13 11:04 A.M.



IMGP0347: The vegetation in the yard between pens 4 and 7 is mowed and there is no evidence of pollutant pathways to the inlet pipe.

Location: East end of the yard between pens 4 and 7.

Facing: West

Date/Time: 09/18/13 11:05 A.M.





IMGP0348: Another corn gluten meal pile is located west of the yard between pens 4 and 7.

Location: West of the yard between pens 4 and 7.

Facing: Southwest

Date/Time: 09/18/13 11:06 A.M.



IMGP0349: The yard between pens 4 and 7 is sloped to the east. Any process wastewater from the corn gluten meal pile to the west of the yard would flow to the east. EPA did not observe any runoff pathways from the corn gluten meal to the inlet pipe.

Location: West of the yard between pens 4 and 7.

Facing: East

Date/Time: 09/18/13 11:07 A.M.



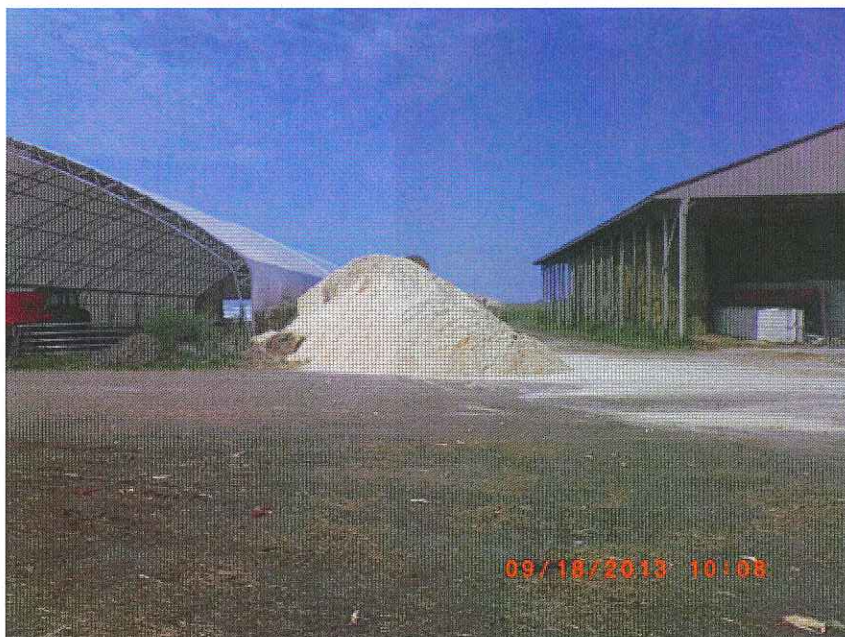


IMGP0350: Sawdust in pile outside the barn and straw is baled and stacked in the barn.

Location: West of pens 4 and 7.

Facing: Northwest

Date/Time: 09/18/13 11:08 A.M.



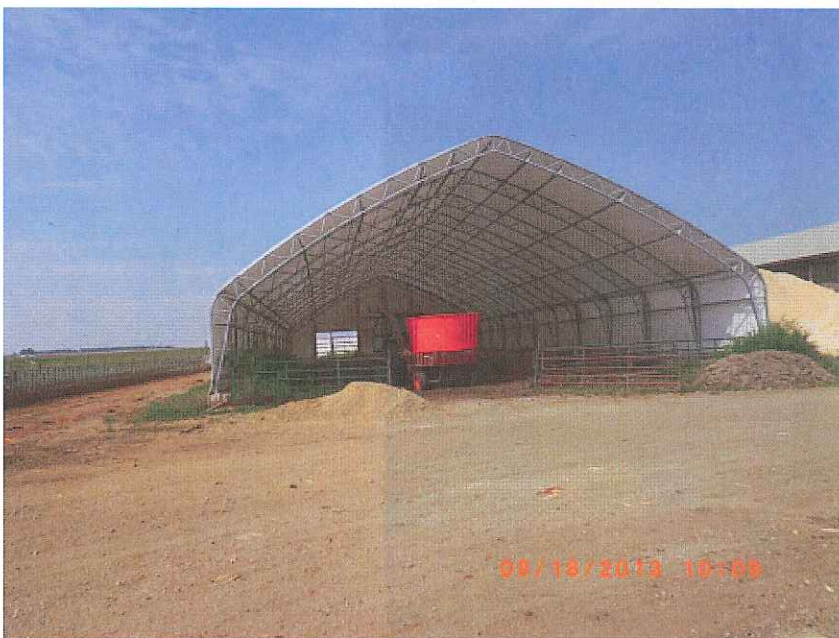
IMGP0351: Sawdust pile.

Location: West of pens 4 and 7.

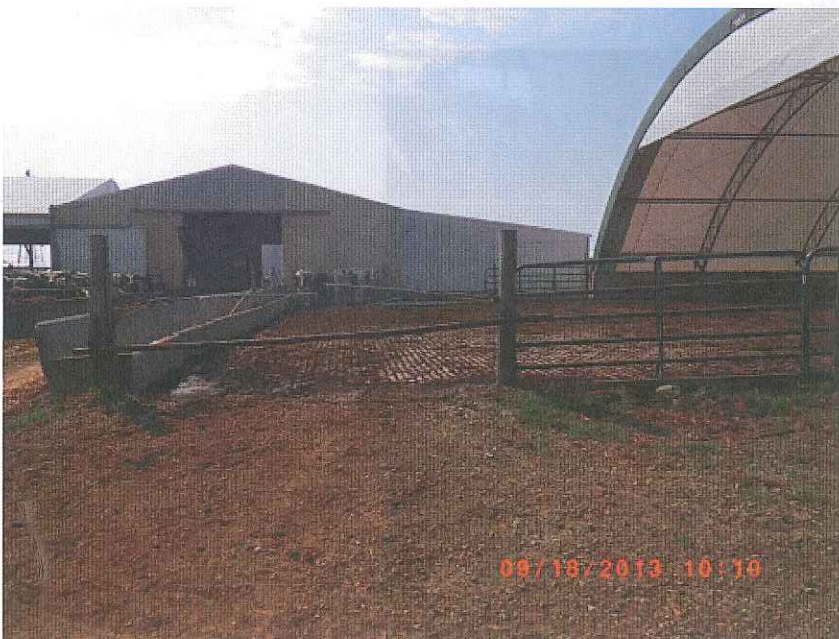
Facing: West

Date/Time: 09/18/13 11:08 A.M.



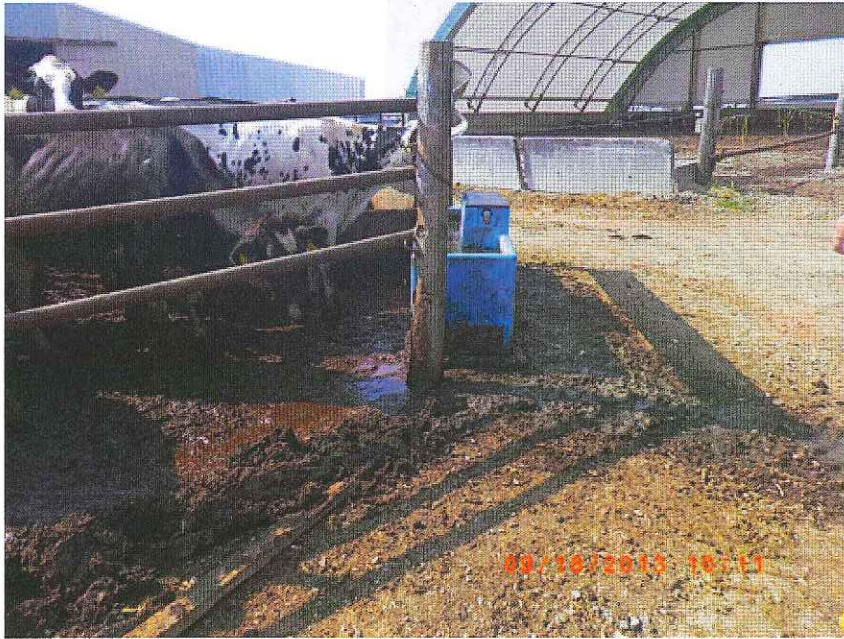


IMGP0352: Fabric building.  
 Location: Northwest of pens 4 and 7.  
 Facing: West  
 Date/Time: 09/18/13 11:09 A.M.



IMGP0353: Open pen for hoop barn is on the east side of the barn.  
 Location: North of pen 6.  
 Facing: South  
 Date/Time: 09/18/13 11:10 A.M.





IMGP0354: Manure and process wastewater that runs off from this pen, Pen 6, flows to the east and to the concrete manure pit.

Location: East of pen 6.

Facing: Southwest

Date/Time: 09/18/13 11:11 A.M.



IMGP0355: Manure and process wastewater that runs off from Pen 6 flows to the east and to the concrete manure pit.

Location: North of Pen 6

Facing: Southeast

Date/Time: 09/18/13 11:11 A.M.





IMGP0356: Sawdust is stored in bays east of Pen 6.

Location: North of Pen 6

Facing: East

Date/Time: 09/18/13 11:11 A.M.



IMGP0355: Manure solids are stored in the bays east of Pen 6. Process wastewater from the bays would flow to the east and to the concrete manure pit.

Location: North of Pen 2

Facing: Southwest

Date/Time: 09/18/13 11:11 A.M.





# ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

## Livestock Facility Inspection Checklist

### GENERAL INFORMATION

#### TYPE OF INSPECTION:

☒ CAFO ☐ COMPLAINT ☐ RECONNAISSANCE ☐ ERU FOLLOW UP ☐ OPERATOR REQUEST ☐ OTHER

FACILITY NAME (LLC, Inc., Corp, Partnership, sole proprietorship, etc.)

E & R Livestock

INSPECTION DATE

May 30, 2013

ARRIVAL TIME

10:30 am

DEPARTURE TIME

ADDRESS

Ex. 6 (Personal Privacy)

LATITUDE (Decimal)

N Ex. 6 (Personal Privacy)

LONGITUDE (Decimal)

W Ex. 6 (Personal Privacy)

GPS Measured ☒

Google Earth ☐

CITY

Ex. 6 (Personal Privacy)

STATE

Ex. 6 (Personal Privacy)

ZIP CODE

Ex. 6 (Personal Privacy)

INSPECTOR(s)

Holste

ACCOMPANIED BY (if applicable)

COUNTY

Champaign

SECTION

7

TOWNSHIP

21N

RANGE

14W

POLITICAL TOWNSHIP

Compromise

TEMP.

73

PRECIP. TYPE / AMT LAST 24HR

Dry

Facility Owner(s):

NAME

Ex. 6 (Personal Privacy)

CONTACTED

☒ YES ☐ NO

PHONE

MOBILE

Ex. 6 (Personal Privacy)

☒ Same as Facility

ADDRESS

CITY

STATE

ZIP CODE

NAME

CONTACTED

☐ YES ☐ NO

PHONE

MOBILE

ADDRESS

CITY

STATE

ZIP CODE

Facility Operator(s):

NAME

Ex. 6 (Personal Privacy)

CONTACTED

☒ YES ☐ NO

PHONE

MOBILE

☒ Same as above

ADDRESS

CITY

STATE

ZIP CODE

NAME

CONTACTED

☐ YES ☐ NO

PHONE

MOBILE

ADDRESS

CITY

STATE

ZIP CODE

### NPDES PERMIT INFORMATION (If no NPDES Permit, skip this section)

1. What type of NPDES permit has been issued?

☒ No NPDES Permit

☐ Individual NPDES Permit

☐ General NPDES Permit

NPDES #

2. What date was the NPDES permit issued?

3. What date does the NPDES permit expire?

4. Is a copy of the NPDES permit onsite?

☐ YES

☐ NO

5. Permitted number of animals (no. & specie)?

6. Does the NPDES Permit contain a compliance schedule?

☐ YES

☐ NO

7. Have there been any changes made to the production area since the permit was issued?

☐ YES

☐ NO

If "YES", provide a detailed description of those changes.



**LAND APPLICATION/NUTRIENT MANAGEMENT**

1. How many TOTAL acres are available for land application?	<u>758</u> acres								
2. How many acres are READILY available for land application at the time of inspection?	<u>0</u> acres								
3. Estimated annual quantities of liquid waste	<u>2,189,661</u> gallons								
4. Estimated annual quantities of solid waste	<u>2852</u> tons								
5. Does the facility have a contractor perform land application? If "YES", Name of Contractor: _____	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO								
6. What type of land application equipment is available to the facility? <input type="checkbox"/> Umbilical Injection <input checked="" type="checkbox"/> Honeywagon Injection <input type="checkbox"/> Honeywagon Surface <input type="checkbox"/> Irrigation <input type="checkbox"/> Rotational Gun <input checked="" type="checkbox"/> Manure Spreader <input type="checkbox"/> Vegetative Filter <input type="checkbox"/> Other _____									
7. Does the facility calibrate the land application equipment? If "YES", What method is used? <b>Weight over area</b>	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO								
8. Does the facility land apply within the 150 foot setback from any water well? If "YES", Explain _____	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO								
9. Does the facility land apply within the 200 foot setback from any surface water? If "YES", Explain _____	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO								
10. Does the facility land apply near any residences? If "YES", Explain _____	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO								
11. Is livestock waste transferred off-site to another party? If "YES", Are records of manure transfers kept? If "YES", Ask to see records	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> YES <input type="checkbox"/> NO								
12. Does the facility have a current NMP or CNMP? If "YES", Does the facility maintain a copy of the nutrient management plan (NMP) onsite?	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO								
13. Does the NMP reflect the current operational characteristics (number of animals, cropping, etc.)?	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO								
14. Are the number of acres owned/leased consistent with those in the NMP?	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO								
15. Is manure and wastewater being applied in accordance with setback/buffer requirements of the NMP?	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO								
16. Are all of the records identified in the NMP being maintained and kept current?	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO								
17. Are records being maintained at the required frequency?	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO								
18. Are records being maintained onsite for the period required by NMP and/or NPDES permit?	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO								
19. Confirm the NMP adequately addresses the following: <table border="0"> <tr> <td><input checked="" type="checkbox"/> Chemicals, Contaminants, &amp; Mortalities Properly Disposed - not Directly Disposed in Waste Handling System</td> <td><input checked="" type="checkbox"/> Storage &amp; Maintenance of Waste Handling System</td> </tr> <tr> <td><input checked="" type="checkbox"/> Animals not in Direct Contact with Waters of US</td> <td><input checked="" type="checkbox"/> Clean Water Diverted from Waste Handling System</td> </tr> <tr> <td><input checked="" type="checkbox"/> Site Specific Buffers &amp; Conservation Practices</td> <td><input checked="" type="checkbox"/> Protocols for Soil &amp; Manure Testing</td> </tr> <tr> <td><input checked="" type="checkbox"/> Land Application Protocols for Nutrient Utilization</td> <td><input checked="" type="checkbox"/> Records Maintained to Document Above</td> </tr> </table>		<input checked="" type="checkbox"/> Chemicals, Contaminants, & Mortalities Properly Disposed - not Directly Disposed in Waste Handling System	<input checked="" type="checkbox"/> Storage & Maintenance of Waste Handling System	<input checked="" type="checkbox"/> Animals not in Direct Contact with Waters of US	<input checked="" type="checkbox"/> Clean Water Diverted from Waste Handling System	<input checked="" type="checkbox"/> Site Specific Buffers & Conservation Practices	<input checked="" type="checkbox"/> Protocols for Soil & Manure Testing	<input checked="" type="checkbox"/> Land Application Protocols for Nutrient Utilization	<input checked="" type="checkbox"/> Records Maintained to Document Above
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<input checked="" type="checkbox"/> Animals not in Direct Contact with Waters of US	<input checked="" type="checkbox"/> Clean Water Diverted from Waste Handling System								
<input checked="" type="checkbox"/> Site Specific Buffers & Conservation Practices	<input checked="" type="checkbox"/> Protocols for Soil & Manure Testing								
<input checked="" type="checkbox"/> Land Application Protocols for Nutrient Utilization	<input checked="" type="checkbox"/> Records Maintained to Document Above								



**LIVESTOCK FACILITY DESCRIPTION**

Type of Animals	Number of Animals (currently)	Animal Capacity	Type of Confinement	Number of Structures
<b>DAIRY DRY Heifer Facility</b>	<b>1188</b>	<b>1200</b>	<b>OPEN CONFINEMENT BUILDING</b>	<b>9 pens</b>
			<b>OPEN CONCRETE FEEDLOT</b>	<b>total for</b>
			<b>OPEN EARTHEN FEEDLOT</b>	<b>Facility</b>

Does the facility have an Illinois Certified Livestock Manager (300 or greater animal units)? ☐ N/A ☒ YES ☐ NO

If greater than 1000 animal units but less than 5000 animal units, does the facility have a waste management plan? ☐ N/A ☒ YES ☐ NO

If greater than 5000 animal units, has the facility submitted a waste management plan to IDOA for review? ☒ N/A ☐ YES ☐ NO

Does the facility have any other locations under common ownership, or where equipment and/or manure is shared, or where the other site shares land application sites? If so, put names and addresses below. ☐ YES ☒ NO

**LIVESTOCK WASTE STORAGE**

1. Does the facility have any existing livestock waste containment system? ☒ YES ☐ NO  
If NO, then proceed to question 10.

2. General description of the waste containment system (include solid and liquid manure handling, mortality, and feed storage areas).

**Precipitation runoff is captured and pumped to lagoon system, solid manure is scraped from the lots daily and placed in a storage area. Runoff from the solid storage area goes to the pump station. The facility also stores solid waste at one of the other crop farms that it operates. This storage area was visited and no evidence of runoff was noted.**

**Mortalities are buried**

**There is a runoff problem from a corn gluten storage area.**



Type of Storage	Total Storage Capacity (Specify Units)
<input type="checkbox"/> Anaerobic Lagoon	
<input type="checkbox"/> Covered Lagoon	
<input checked="" type="checkbox"/> Holding Pond	More than 2 million gallons
<input type="checkbox"/> Above Ground Storage Tank ("Slurrystore")	
<input type="checkbox"/> Below Ground Storage Tank	
<input checked="" type="checkbox"/> Settling Basin	Unknown, really it is a pump station
<input type="checkbox"/> Roofed Storage Shed	
<input type="checkbox"/> Concrete Pad	
<input type="checkbox"/> Impervious Soil Pad	
<input type="checkbox"/> Underfloor Pits	
<input type="checkbox"/> Anaerobic Digester	
<input checked="" type="checkbox"/> Manure Stacks	1500 plus tons
<input type="checkbox"/> Vegetative Filter	
<input type="checkbox"/> Other _____	
<input type="checkbox"/> None	
3. Do the storage structures have depth markers or staff gauges? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	
4. Are levels of manure in the storage structures recorded and records kept? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	
5. Do the storage structures have adequate freeboard? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	
6. Estimated final stage storage structure freeboard _____ in. of total depth _____ in.	
7. Do facility personnel perform routine visual inspections of the storage structures? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	
8. Are the routine visual inspections documented? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	
9. Does the system have an outfall or discharge point? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	
If "YES", please provide a description (overflow pipe, spill way, etc. Include a description the area receiving the discharge).	
10. Are there any portions of the production area where runoff is not controlled? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	
If "YES", provide a detailed description of the area(s) of concern: <b>Gulten storage area does not have any runoff controls and materials have flowed into road ditch. Photos documenting situation attached. Situation was discussed with owner and he agreed that something needed to be done.</b>	
<b>MORTALITIES MANAGEMENT</b>	
1. How are mortalities managed? (Composted, buried, burned, rendering service, other) <b>Buried.</b>	
2. Are mortalities documented and are records kept? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	



**FACILITY WATER SOURCES**

1. What type of method is used to provide drinking water for the animals?

☐ Overflow waters    ☐ Tip Tanks    ☐ Nipple waters    ☐ Water Bowls    ☒ Other **Fountains**

2. How is the water for animals obtained?

☐ Community PWS    ☒ On-Site Well    ☐ On-Site Impoundment    ☐ Other \_\_\_\_\_
3. Is a mist cooling system used? ☐ YES    ☒ NO

How is mist water contained?

**DAIRY OPERATION (If No Dairy, skip this section)**

1. How many times per day are cows milked? \_\_\_\_\_

2. Describe how the dairy's non-contact cooling water is contained (Example: it is reused for drinking water for the animals).

3. Describe how the milking parlor is cleaned (hose or flush) and where the process wastewater goes and how it is contained.

4. Describe how the tank(s) are washed and where the process wastewater goes and how it is contained.

5. Describe where process wastewater from the plate cooler goes and how it is contained.

**BEDDING (If No Bedding, skip this section)**

1. Describe what type of bedding is used for the animals.

**Saw dust is used for inside pens.**

2. Describe how bedding is collected and how often.

**Bedding is scaped up as solid waste as needed based on its condition.**3. What is done with the used bedding? ☐ Reused    ☒ Land Applied



**MANURE COLLECTION**

1. How is manure collected?

☐ Under Floor Pit☒ Scraped: ☐ Automatic ☒ Manual☐ Flush☐ Solids Separator☒ Other: Runoff goes to pump station that is tributary to holding pond.☐ None

2. If manure collection system uses either clean or reused water to flush, describe where this water goes and how it is contained.

**FEED STORAGE CONTAINMENT**

1. Describe how feed (silage, hay, etc) is contained.

☐ Bulk Bins☒ Silage Pit☐ Ag Bags☒ Hay: ☒ Barn ☐ Outdoor☒ Other: Corn Gluten - Outdoor storage pile.

2. Describe how feed (silage, hay, etc) runoff is contained.

☐ Not Applicable – Feed totally enclosed☐ Other: \_\_\_\_\_☒ None**RECEIVING SURFACE WATERS**

1. Provide a description of the flow path from the facility to the nearest named surface water.

**Uncollected precipitation runoff on the east side of the facility flows to the road ditch and then to a ditch tributary to Buck Creek. On the west side of the facility, precipitation tends to pond and not runoff due to the flat topography.**

2. What is the name of the receiving stream?

**Buck Creek with is tributary to Middle Fork of Vermilion River**

3. Status of the named surface water: ☐ Intermittent ☒ Perennial4. Are any unnatural bottom deposits observed in the receiving stream: ☐ YES ☒ NO

If "YES", provide a description of the deposits:



**DISCHARGES**

1. Have there been any documented discharges of livestock waste to surface water <i>in the past year</i> ? If "NO" proceed to question 2.	<input type="checkbox"/> YES	<input checked="" type="checkbox"/> NO
a. If "YES", specify the date(s). _____		
b. What was the reason for the discharge?		
c. Was the discharge the result of a 25 year-24 hour rainfall event?		
	<input type="checkbox"/> YES	<input type="checkbox"/> NO
d. What was the precipitation amount? (if applicable)		
e. Was IEMA notified of the discharge?	<input type="checkbox"/> YES	<input type="checkbox"/> NO
f. Has the facility taken corrective action to remedy the situation which caused the discharge(s)?	<input type="checkbox"/> YES	<input type="checkbox"/> NO
If "YES", describe actions taken:		
2. Is the facility currently discharging livestock waste from the production area? If "NO" proceed to next section.		
	<input type="checkbox"/> YES	<input checked="" type="checkbox"/> NO
a. Was the discharge the result of a 25 year-24 hour rainfall event?	<input type="checkbox"/> YES	<input type="checkbox"/> NO
b. What was the precipitation amount? (if applicable)		
c. What is the reason for the discharge?		
d. Number of water quality samples taken: _____		
e. Locations of Water Quality Samples Relative to Discharge Flow: <input type="checkbox"/> Discharge Point/Flow Path		
<input type="checkbox"/> Upstream Waters of US <input type="checkbox"/> Confluence Waters of US <input type="checkbox"/> Downstream Waters of US		
<input type="checkbox"/> Other _____		
f. What parameter(s) tested? <input type="checkbox"/> pH <input type="checkbox"/> Ammonia <input type="checkbox"/> Nitrate <input type="checkbox"/> Nitrite <input type="checkbox"/> Phosphorus <input type="checkbox"/> BOD <sub>5</sub>		
<input type="checkbox"/> Total Susp Solids <input type="checkbox"/> Fecal <input type="checkbox"/> Diss O <sub>2</sub> <input type="checkbox"/> Other _____		
g. Describe Flow Path to "Waters of US":		

**BIOSECURITY – Inspection Activities**

1. Were biosecurity measures discussed with the facility prior to inspection?	<input checked="" type="checkbox"/> YES	<input type="checkbox"/> NO
2. Has there been 24-hours downtime between inspections for all IEPA personnel present?	<input checked="" type="checkbox"/> YES	<input type="checkbox"/> NO
3. Was the order of inspection conducted from high risk to low risk?	<input checked="" type="checkbox"/> N/A	<input type="checkbox"/> YES <input type="checkbox"/> NO
4. Did all personnel stay outside livestock management and livestock waste handling facilities as defined in 35 IAC 501.285 and 35 IAC 501.300? If "YES" skip to question 7.	<input type="checkbox"/> YES	<input checked="" type="checkbox"/> NO

**BIOSECURITY – Personal Protection Equipment**

5. Was sanitary footwear donned prior to entering the livestock management/waste handling facility(s)?	<input type="checkbox"/> N/A Did not Enter	<input checked="" type="checkbox"/> YES	<input type="checkbox"/> NO
6. Were disposable coveralls donned prior to entering the livestock management/waste handling facility(s)?	<input type="checkbox"/> N/A Did not Enter	<input type="checkbox"/> YES	<input checked="" type="checkbox"/> NO
7. Was sanitary footwear used during the inspection?		<input checked="" type="checkbox"/> YES	<input type="checkbox"/> NO
8. Was disposable sanitary outerwear disposed at the facility?		<input checked="" type="checkbox"/> YES	<input type="checkbox"/> NO



**BIOSECURITY – Vehicle**

9. Was the vehicle parking location discussed with the facility prior to inspection?	<input checked="" type="checkbox"/> YES	<input type="checkbox"/> NO
10. Was the vehicle washed since the inspection prior to current? If "YES" skip question 11.	<input checked="" type="checkbox"/> YES	<input type="checkbox"/> NO
11. Was the vehicle parked >300-feet from the livestock management/waste handling facility? Explain where vehicle was parked:	<input type="checkbox"/> N/A	<input type="checkbox"/> YES <input type="checkbox"/> NO
12. Was IEPA vehicle used on site?	<input type="checkbox"/> YES	<input checked="" type="checkbox"/> NO
13. Was facility vehicle used on site?	<input type="checkbox"/> YES	<input checked="" type="checkbox"/> NO

**BIOSECURITY – Inspection Equipment**

14. Was all equipment wiped down with anti-bacterial wipes?	<input type="checkbox"/> YES	<input checked="" type="checkbox"/> NO
15. Was sample cooler kept inside vehicle during inspection? If "YES" skip question 16.	<input checked="" type="checkbox"/> YES	<input type="checkbox"/> NO
16. Was sample cooler wiped down with antibacterial wipes before placing back into vehicle?	<input type="checkbox"/> N/A	<input type="checkbox"/> YES <input type="checkbox"/> NO

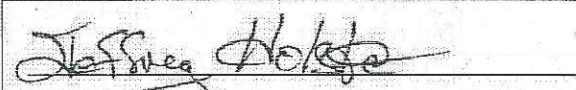
**OTHER COMMENTS/NOTES**

The inspection was started with a review of the facility's CNMP and records. After the paperwork review we proceeded to walk around the outside of the facility starting at the residence and going west along the south side of the facility. The walking tour continued in a clockwise direction there after finishing at the residence again. During the tour we walked through one vegetated area that is occasionally used for animal confinement, but no other entry into animal confinement pens was done.

The facility has some areas that could use better housekeeping, but in those areas there is little to no evidence that runoff is an issue. However, in the corn gluten storage area on the east side of the facility it is clear that runoff has reached the road ditch and maybe beyond. Buck Creek was observed downstream of where any runoff from the facility would reach the stream. The stream was clear with live fish and appeared natural for a farming community stream.

The manner in which the Corn Gluten is being stored is an apparent violation of Sections 12(a) & (d) of the Illinois Environmental Protection Act.

Check all attachments: ☐ Narrative ☒ Photos ☒ Site Plan ☐ Sample Results

**INSPECTOR'S SIGNATURE****REPORT DATE****July 30, 2013**

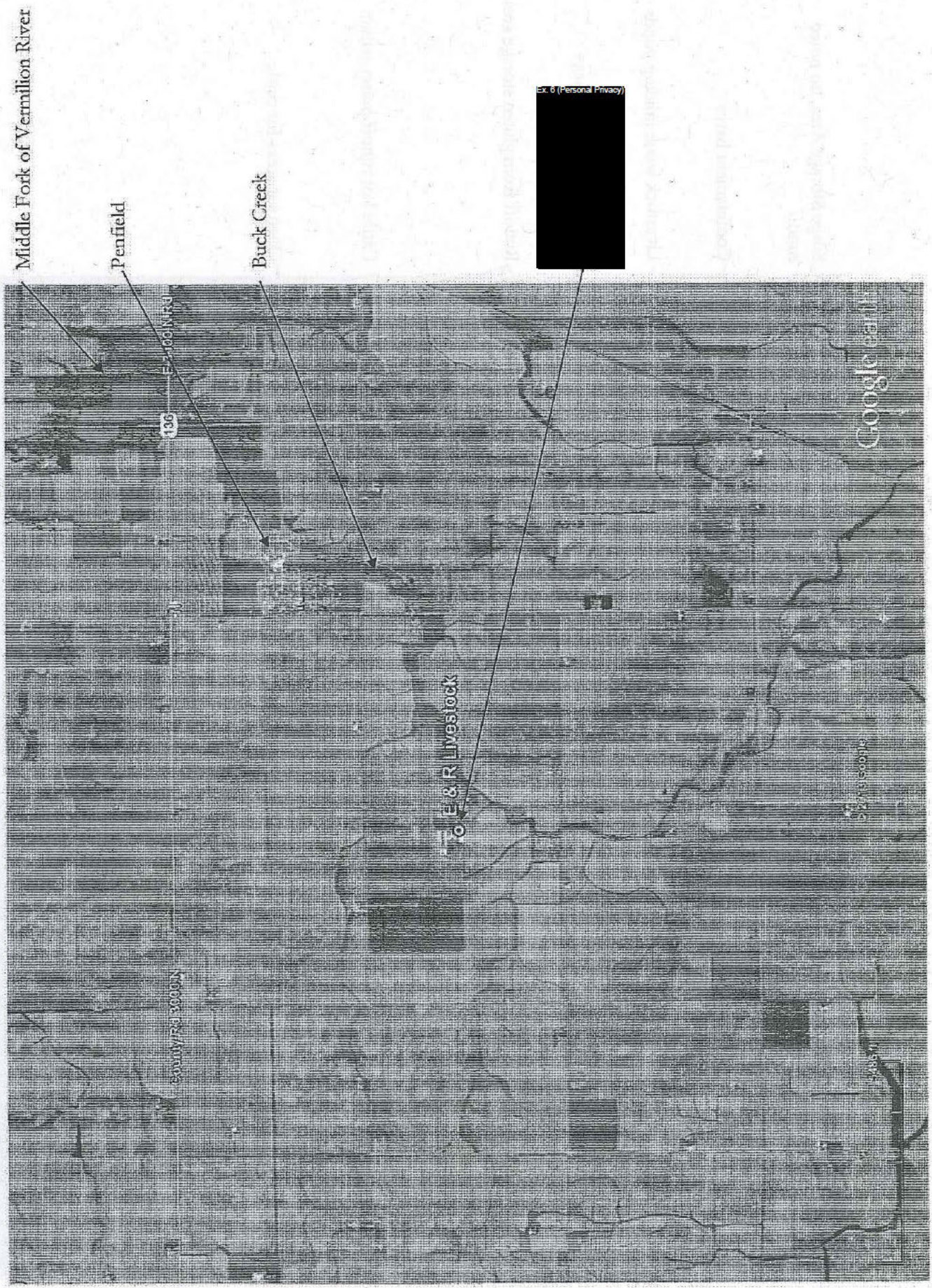
Cc: BOW/DWPC/RU

Attachments: \_\_\_\_\_

Revised February 2013

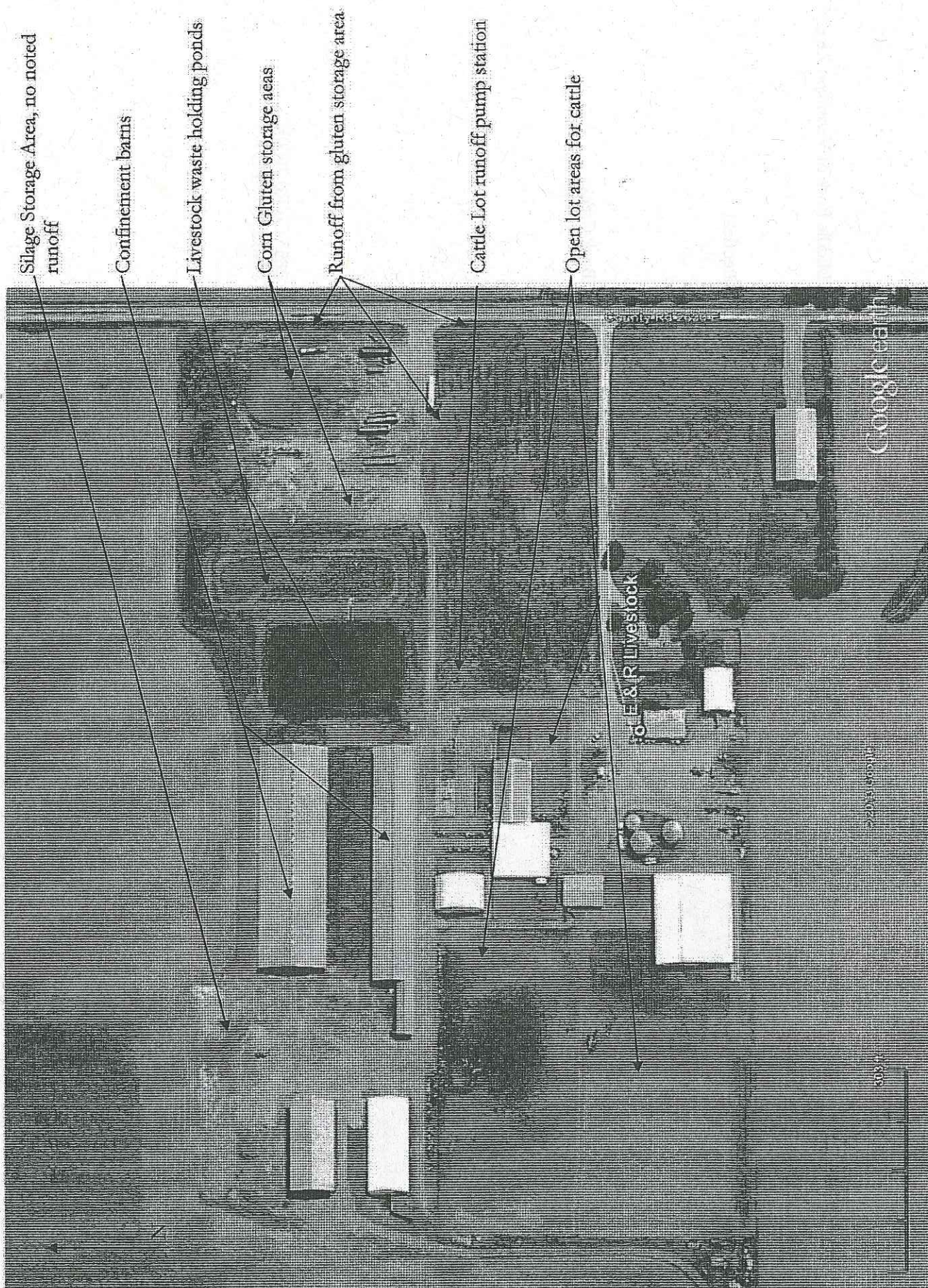


E & R Livestock  
May 30, 2013





E & R Livestock  
May 30, 2013





Champaign County  
E and R Livestock  
Photos by J.P. Holste  
May 30, 2013

Photo #1

Photo looking north along the west ditch of 2600E Road at the north entrance to the facility. Note the dark material located in the ditch. This is corn gluten and poor quality water that has runoff from the corn gluten storage pile. This ditch is tributary to another ditch that flows into Buck Creek.



Photo #2

Photo looking at runoff from the corn gluten pile into a low area between the drives for the facility. This accumulated organic matter in a wet area tends to cause degradation of the water that collects in that low area.





Champaign County  
E and R Livestock  
Photos by J.P. Holste  
May 30, 2013

Photo #3

This photo shows the low area between the drives from a closer perspective. The lack of vegetation tends to indicate the standing water issue that plagues this area. Staining on the gravel drive due to runoff from the corn gluten storage piles.

Runoff from the low area flows into the road ditch and thus is tributary to Buck Creek.

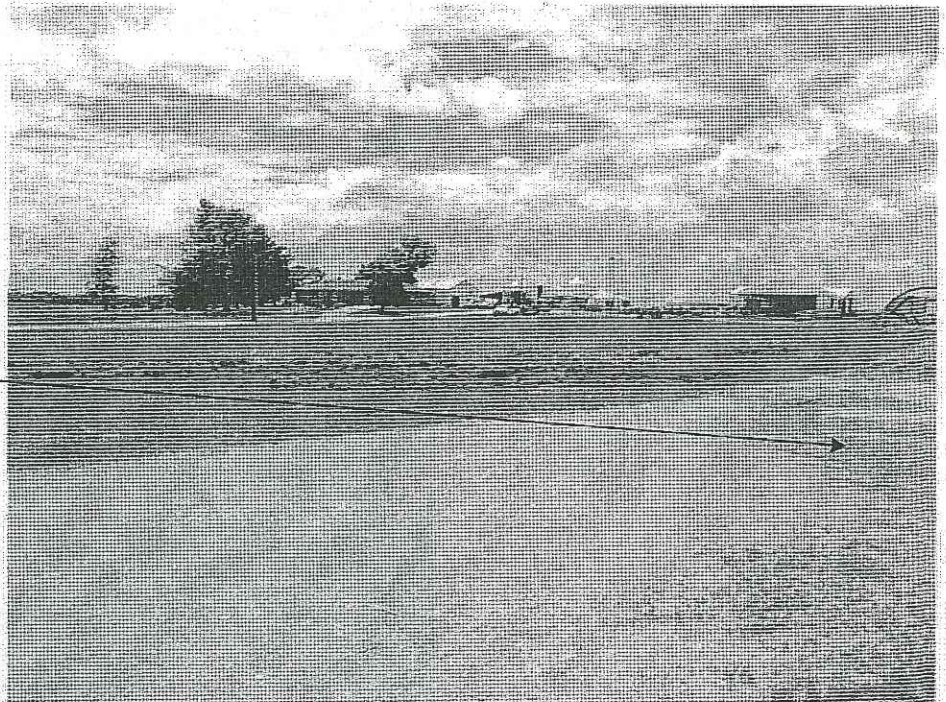


Photo #4

This photo is looking at the west road ditch for 2600E Road taken at the south entrance to the facility. The grass blown over the ditch is hiding material that has runoff from the corn gluten storage area.

